

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor in
interest to National City Bank,

Plaintiff,

v.

Des Plaines Yamaha & Suzuki, Inc.; Chicago
Title Land Trust Company, as Successor Trustee
to Harris Trust and Savings Bank as Trustee
under Trust Agreement dated August 1, 1967 and
known as Trust No. 32873; Beneficiaries of
Chicago Title Land Trust Company, as Successor
Trustee to Harris Trust and Savings Bank as
Trustee under Trust Agreement dated August
1, 1967 and known as Trust No. 32873; Harvey
Fields; Reid Fields; Betty J. Fields; Blanche
Fields,

Defendants.

Case No. 1:12 cv 07948

Assigned Judge: James B. Zagel

Magistrate Judge: Mary M. Rowland

Property Address:

1529 Rand Road

Des Plaines, Illinois 60016

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest to
National City Bank, by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of
a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Des Plaines Yamaha & Suzuki, Inc.

Chicago Title Land Trust Company, as Successor Trustee to Harris Trust and Savings
Bank as Trustee under Trust Agreement dated August 1, 1967 and known as Trust No.
32873;

Beneficiaries of Chicago Title Land Trust Company, as Successor Trustee to Harris Trust
and Savings Bank as Trustee under Trust Agreement dated August 1, 1967 and known as
Trust No. 32873

Harvey Fields;

Reid Fields;

Betty J. Fields;

Blanche Fields;

and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion attached hereto as Exhibit "A", and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor in
interest to National City Bank,

By: /s/Christopher S. Fowler
One of Its Attorneys

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